



NATIONAL NETWORK
TO END DOMESTIC
VIOLENCE

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December 7, 2009

Commission's Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Re: WC Docket No. 03-109, Matter of Lifeline & Link-up, TracFone's Request for Clarification of Universal Service Lifeline Program "One-Per-Household" Rule as Applied to Group Living Facilities

Dear Chairman Genachowski:

On behalf of the National Network to End Domestic Violence (NNEDV), an advocacy organization that represents 56 state and territorial domestic violence coalitions, their 2,000 member programs, and the millions of individuals and families across America affected by domestic violence, we are writing to submit reply comments regarding TracFone's request for clarification of the "One-Per-Household" rule as applied to group living facilities.

We agree with many of the points raised in other comments submitted and we are requesting that the final rule include clarifications which will ensure that individuals temporarily living in shelters, group facilities, or in other situations where they do not have an individual, unique address, are provided the opportunity to access Lifeline services.

I. We request that the Commission clarify that the "One-Per-Household" rule is not intended to limit the eligibility of low-income customers based on their housing status.

For survivors of domestic violence, shelters, transitional housing programs, and group facilities provide services that are crucial to their safety and ability to escape an abuse. TracFone and Virgin Mobile are currently obligated to deny requests for more than one Lifeline service at the same address and to ensure that Lifeline recipients provide a primary residential address. This obligation excludes people living in group facilities from receiving Lifeline benefits, a result that contradicts the Universal Service policies set forth by Congress.

Individuals living within shelters and transitional housing programs do not have a unique address but often have low-incomes and could benefit greatly from the opportunity to access affordable services. Many individuals live together in these programs who are

not related and are not part of the same household, but will temporarily share the same address. The current rule allows for only one person in the entire shelter to be eligible for the Lifeline service.

Access to telecommunication services is crucial for residents living in shelter as many programs do not have the ability to provide individual landlines, even when residents have their own room. Domestic violence victims depend on phones to secure permanent housing, obtain employment, communicate with schools and doctors about their children, and connect with family and friends. They are also crucial to a victim's ability to reach emergency services and help if needed. We strongly encourage the Commission to clarify the "One-Per-Household" rule to ensure that Lifeline support services are available to individuals living in group facilities.

II. We request that the Commission consider the confidentiality of shelter locations and the privacy of survivors in relation to safety.

We are aware of suggestions to ensure eligibility of applicants and avoid fraud by confirming through the non-profit program a person's stay at a shelter or group facility. The safety of both the individuals residing at shelters and the staff working there often depends on the location of the residence remaining confidential. For programs with a confidential, unlisted address, we urge the Commission to allow PO Boxes and mailing address of programs to be used as the common address for individual applicants residing at the undisclosed shelter program.

III. We request that the Commission clarify that the eligible addresses do not need to be classified as "residential" only.

Many shelter, transitional housing programs, and group living facilities are considered to be commercial properties. If the rule is interpreted to mean only residential addresses, then all individuals temporarily residing within one of these programs would be ineligible for LifeLine service.

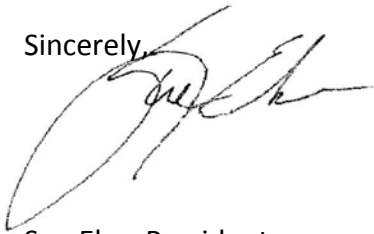
IV. We request that the Commission, in regards to providing Lifeline service to homeless individuals who are not residing at a shelter, to reach out to non-profit, community-based organizations to ensure these individuals receive services as well.

One of the leading causes of homelessness for women is domestic violence, and having access to telecommunication services can be central to their ability to find safe services, obtain temporary or permanent housing, secure employment, or access emergency services if needed. Additionally, victims may end up temporarily residing with a friend or family member rather than staying in a shelter. Finances are often a challenge for victims who are trying to escape abuse, so it is important that strategies are identified to ensure Lifeline services to this population of people. Local programs that are doing front-line work with homeless individuals and domestic violence programs that are

providing non-residential services will be best suited to provide guidance on ensuring services to individuals without any address. Their programs may be able to facilitate the application process to ensure services are available. NNEDV, in our umbrella role with 3000 local outreach and shelter programs, would be happy to coordinate with the Commission to achieve this goal.

We thank you for considering these comments and we encourage the Commission's careful consideration of the unique concerns of survivors of domestic violence, sexual assault, dating violence, and stalking as it evaluates the "One-Per-Household" Rule and the means for documenting and verifying eligible customers, as well as any clarifications of "residential" address obligations. If you have any further questions, please contact myself or Cindy Southworth at 202.543.5566.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sue Else', with a large, sweeping initial 'S'.

Sue Else, President
National Network to End Domestic Violence